



January 6, 2009

Attn: L. Nelson Roberts, Jr.  
South Carolina DHEC-Bureau of Air Quality  
2600 Bull Street  
Columbia, South Carolina 29201-1708

RE: Ozone Non-attainment Boundary Comments

Dear Mr. Roberts:

I have taken the opportunity to review the proposed boundaries for ozone non-attainment and wish to comment about the inclusion of Laurens County as a non-attainment county. I spoke with your staff over the summer about potential non-attainment areas and at the time it was generally felt that Laurens County would not be included. Specifically, Laurens County has a limited industrial base, population, economic base, and transportation system especially as compared to Greenville County. Additionally, based on the geographic location of Laurens County any restrictions on industrial development as would be enacted would have little or no affect on the non-attainment status of Greenville. Therefore, deeming Laurens County as non-attainment makes no sense.

I have been involved with state agencies working on designating non-attainment areas in Tennessee and Georgia. The general consensus has always been that designating lesser developed areas and those geographically south of non-attainment areas have little affect on ozone attainment and makes little sense especially from an economic standpoint. The stigma of non-attainment can further depress areas by forcing out industry and/or preventing development of areas industrial or otherwise.

From an overall perspective DHEC should also look to actions taken by other state agencies. Specifically, I'm aware of Georgia allowing companies to replace oxidizers (VOC control) with biofilters thus eliminating the ozone-forming pollutant NOx and reducing emissions of greenhouse gases (but still controlling VOCs). Norbord operates facilities in Canada and Europe but is only required to operate oxidizers on process exhausts at some locations in the United States. Canadian and European governments have known for quite some time that oxidizers in many industries create more pollution than they control and are a waste of money.

Overall, statewide proposals appear well thought out, and I commend DHEC's review of the situation. However, the designation of Laurens County does not make sense and does not meet the criteria as laid out in the public notice. Additionally, designating Laurens County as non-attainment will negatively affect Norbord when considering future expansion as all of our other facilities reside in attainment areas around the Southeast.

I would also like to complain that I did not receive notice of the public comment period and just recently became aware of the notice by accident. I recommend that the public comment period be extended and a notice to all industries be sent so that a proper response can be sent by representatives of industry around the State.

Sincerely,

Phil Towles  
Manager Environmental Services

cc: Senator Daniel Verdin  
Representative Mark Willis